

1 MICHELE BECKWITH
2 Acting United States Attorney
3 MATHEW W. PILE
4 Associate General Counsel
5 Office of Program Litigation, Office 7
6 JAMES KI, WSBN 42978
7 Special Assistant United States Attorney
8 Office of Program Litigation, Office 7
9 Office of the General Counsel
10 Social Security Administration
11 6401 Security Boulevard
12 Baltimore, MD 21235
13 Telephone: (212) 264-2435
14 james.ki@ssa.gov

15 Attorneys for Defendant

16 **UNITED STATES DISTRICT COURT**
17 **EASTERN DISTRICT OF CALIFORNIA**

18
19
20
21 NICOLE MASTROMATTEO, } Case No.: 2:25-cv-00267-CKD
22 Plaintiff, } STIPULATION AND ORDER FOR AN
23 vs. } EXTENSION OF TIME
24 COMMISSIONER OF SOCIAL SECURITY, }
25 Defendant. }
26

27 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the
28 parties, through their respective counsel of record, that the time for Defendant to respond to
Plaintiff's Motion for Summary Judgment be extended thirty (30) days from June 16, 2025, up to
and including July 16, 2025. This is the Defendant's first request for an extension. Plaintiff's
reply, if any, would now be due July 30, 2025.

29 Defendant makes this request in good faith and for good cause. This case was recently
30 reassigned to me. I am currently assigned to three cases with briefing deadlines in the next ten
31

1 days. I have been diligently working on cases, having drafted three briefs in the past week.
2 Defendant apologizes to the Court and to Plaintiff for any inconvenience caused by this request.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 Dated: June 12, 2025

/s/ Sherianne Laba*
(*as authorized via e-mail on June 12, 2025)
SHERIANNE LABA
Attorney for Plaintiff

9 Dated: June 12, 2025

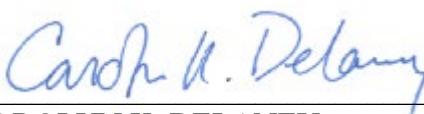
10 MICHELE BECKWITH
11 Acting United States Attorney
12 MATHEW W. PILE
Associate General Counsel
Social Security Administration

13 By: /s/ James Ki
14 James Ki
15 Special Assistant U.S. Attorney
16 Attorneys for Defendant

17 **ORDER**

18 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
19 extension, up to and including July 30, 2025, to respond to Plaintiff's Motion for Summary
20 Judgment.

21 Dated: June 16, 2025

22 
23 CAROLYN K. DELANEY
24 UNITED STATES MAGISTRATE JUDGE
25
26
27
28